

UNITED STATES BANKRUPTCY COURT  
IN THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Courtney Ragin Franklin

Debtor

Bankruptcy No. 18-14959 JKF

Chapter 13

Pennsylvania Housing Finance  
Agency

Movant

Courtney Ragin Franklin

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
OF PENNSYLVANIA HOUSING FINANCE AGENCY**

Debtor, by and through her attorney, Robert D. Steinberg, Esq. answers the Motion as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.

7. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.

8. Denied. The Debtor has made post-petition payments. To the extent that Debtor is in arrears post-petition, she can cure that arrearage.

9. Denied. To the extent that Debtor is in arrears post-petition, she can cure that arrearage.

10. Denied.

11. This paragraph contains no allegations of fact and requires no response.

Wherefore, debtor requests that this Honorable Court enter an Order denying the Motion for Relief.

Respectfully submitted,

BY: /s/ ROBERT D. STEINBERG  
ROBERT D. STEINBERG, ESQ.  
PA ID No. 34818  
Willig, Williams & Davidson  
1845 Walnut Street, 24<sup>th</sup> Floor  
Philadelphia, PA 19103  
215-814-9225